

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Ellen S. Ewald,

Civil No. 11-cv-02116 (SRN/SER)

Plaintiff,

vs.

**PLAINTIFF'S MOTION  
TO COMPEL DISCOVERY**

Royal Norwegian Embassy,

Defendants.

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**TO: DEFENDANT ABOVE-NAMED AND ITS ATTORNEYS, SEAN SOMERMEYER, ESQ., DANIEL G. WILCZEK, ESQ., AND JOEL SCHROEDER, ESQ., FAEGRE BAKER DANIELS LLP, 2200 WELLS FARGO CENTER, 90 SOUTH SEVENTH STREET, MINNEAPOLIS, MN 55402-3901.**

Plaintiff Ellen S. Ewald, by and through her attorneys, hereby moves this Court, pursuant to Rule 37(a)(3)(B) of the Federal Rules of Civil Procedure, for an order compelling Defendant Royal Norwegian Embassy to respond to discovery as follows:

1. Provide complete responses to Plaintiff's Interrogatory Nos. 3 and 13;
2. Provide complete responses to Plaintiff's Document Request Nos. 8 and 19;
3. Designate which specific interrogatories and document requests

Defendant's documents produced respond to;

4. Provide complete responses to Plaintiff's Interrogatory Nos. 21 and provide complete responses to Plaintiff's Document Request No. 30 by producing information relating to its methods of preserving, collecting, processing and producing documents;

5. Produce Plaintiff's phone and laptops for forensic inspection by Plaintiff's counsel and its IT/forensic consultants;
6. Produce the mobile phones of key employees of Defendant, as requested in Plaintiff's Document Request No. 29;
7. Produce text messages that contain messages that are responsive to Plaintiff's interrogatories and/or document requests;
8. Remove redacted information from documents produced that have not been shown to be privileged documents;
9. Provide documents related to other employees of Defendant's complaints of gender discrimination and unequal pay;
10. Produce documents related to statistics and studies of wages for Defendant's employees; and
11. Produce information relating to bullying issues among Defendant's personnel.

The motion will be made upon all the files, records, and proceedings in this action and upon the memorandum and other supporting papers.

**ENGELMEIER & UMANAH, P.A.**

Dated: July 29, 2013

By /s/ Sheila Engelmeier  
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**ATTORNEYS FOR PLAINTIFF**